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June 20, 2023

DELIVERED VIA ECF

The Honorable Louis L. Stanton
Thurgood Marshall Courthouse
40 Foley Square, Courtroom 219
New York, NY 10007

Case Title: *Freeman v. Deebs-Elkenaney et al,*
1:22-cv-02435-LLS-SN
Re: **Plaintiff's Motion to Seal Certain Documents**

Dear Judge Stanton:

We write on behalf of Plaintiff Lynne Freeman pursuant to Your Honor's Individual Rule III. B regarding filing documents under seal and in connection with Plaintiff's Motion for Reconsideration (ECF No. 224). Plaintiff filed under seal the unredacted version of Exhibit 3 to her June 20, 2023 Motion for Reconsideration. This exhibit consists of Plaintiff's expert report of Dr. Carole E. Chaski, which has been marked as confidential because it references documents that Defendants produced in this case as confidential. A redacted version removing only those references has been publicly filed as Exhibit 3 to the aforementioned motion. We have thus filed this Letter Motion under Seal and filed a redacted copy of the motion unsealed to protect any confidential information.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

By: /s/ Stephen M. Doniger
Stephen M. Doniger, Esq.
Scott Alan Burroughs
DONIGER / BURROUGHS PC
For the Plaintiff

IT IS HEREBY ORDERED.

Dated: _____, 2023

By: _____
Hon. Louis L. Stanton
U.S. District Judge